

45 East 34th Street, 5th Floor New York, New York 10016 Tel.: (212) 594-1035 Email: yji@ahnejillp.com

Website: www.ahnejilaw.com

November 16, 2021

Via ECF

Hon. Debra C. Freeman, U.S.M.J. Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Courtroom 17A New York, NY 10007

Re: Hee Bong Han v. Roosevelt Island Cleaners Inc., et al.

Civil Action No.: 1:20-cv-09068-LJL

Dear Judge Freeman:

This office represents the Defendants, Roosevelt Island Cleaners, Inc. and Jay Moon, in the above-referenced matter. We are submitting this letter, with consent of the Plaintiff's counsel, to request an extension of time to submit the Parties' fully executed settlement agreement and *Cheeks* fairness letter, which are currently due November 19, 2021.

Our office was advised that our client, Jay Moon, is currently being hospitalized due to his medical condition. Although the Parties have finalized a settlement agreement, due to Mr. Moon's hospitalization, he will not be able to sign the settlement agreement in a timely manner. Based on his current medical condition, he is expected to be released from the hospital some time next week. For this reason, we respectfully request that the Court allow a two-week extension for the Parties' fairness submission up to and including November 30, 2021.

We apologize for any inconvenience this may have caused, and we thank the Court for its time and consideration in this matter.

Respectfully submitted,

/s/ Younghoon Ji

AHNE & JI, LLP

By: Younghoon Ji, Esq.

cc: Via ECF

Ryan J. Kim, Esq. *Attorneys for Plaintiff* 

elella s

SO ORDERED

DEBRA FREEMAN United States Magistrate Judge

Dated: 11/19/2021